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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92055558
Party	Defendant Emmmanouil Kokologiannis and Sons, Societe Anonyme of Trade, Hotels And Tourism S.A. "with the business title "Scala" "Pangosmio"
Correspondence Address	CAMERON REUBER LEASON ELLIS LLP ONE BARKER AVENUE, FIFTH FLOOR WHITE PLAINS, NY 10601 UNITED STATES clarke@leasonellis.com, reuber@leasonellis.com, tmdocket@leasonellis.com
Submission	Other Motions/Papers
Filer's Name	Deirdre A. Clarke
Filer's e-mail	clarke@leasonellis.com, reuber@leasonellis.com, tmdocket@leasonellis.com
Signature	/deirdreclarke/
Date	02/18/2015
Attachments	pretrial disclosures.pdf(196024 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Registration No. 3,256,667

ECONOMY RENT-A CAR INC.,	-----X	
	:	
	:	
Petitioner,	:	Cancellation No. 92048732
	:	
v.	:	
	:	
EMMANOUIL KOKOGIANNIS	:	
AND SONS, SOCIETE ANONYME	:	
OF TRADE, HOTELS AND TOURISM	:	
S.A.,	:	
	:	
Respondent.	:	
	-----X	

RESPONDENTS' AMENDED PRETRIAL DISCLOSURES

Respondent, Emmanouil Kokologiannis and Sons, Societe Anonyme of Trade, Hotels and Tourism S.A. ("Respondent"), by and through their attorneys, Leason Ellis LLP, for their pretrial disclosures pursuant to Fed.R.Civ.P. 26(a)(3) and TBMP 702.01, make the following pretrial disclosures to Petitioner, Economy Rent-A-Car Inc. ("Petitioner"), of the witnesses from whom Petitioners may take testimony during their trial testimony period, of the subjects on which such witnesses are expected to testify, and the types of documents and things which may be introduced as exhibits during the testimony of such witnesses.

1. Yorgos Kokologiannis
President, Emmanouil Kokologiannis and Sons,
Societe Anonyme of Trade, Hotels and Tourism S.A.
Agia Pelagia
715 00 Heraklion
Crete, Greece
Tel.: +30 2810 812012

Mr. Kokologiannis is the President of the named Respondent in this proceeding. He has knowledge of, and will testify about, the past and current use of Respondent's ECONOMY CAR

RENTALS & design trademark that is the subject of this cancellation proceeding. Within the context of the governing protective order, Mr. Kokologiannis will provide testimony relative to Respondent's website traffic, advertising expenditures, and customer bookings. Mr. Kokologiannis will testify concerning Respondent's knowledge of, and interaction with, Petitioner. Certain documents and things may be introduced as exhibits during the testimony of Mr. Kokologiannis including screenshots taken from Respondent's websites, trademark registrations, internal audit reports concerning investments in advertising, examples of booking documents provided by Respondent to customers, internal reports concerning Respondent's website traffic, advertising materials and copies of correspondence received from Petitioner.

2. Robert Thunell
BLT Consulting, LLC
5829 E. 58th Street
Tulsa, OK 74135
Tel.: 305-519-9080

Mr. Thunell is principal in BLT Consulting, LLC, an Oklahoma company, and signatory on certain agreements concerning the transfer of an alleged service mark ECONOMY RENT-A-CAR to Petitioner's related company. Mr. Thunell will be asked to testify concerning those agreements. Mr. Thunell will also be asked to testify concerning his past and present relationships with Petitioner and Petitioner's related companies. He will also be asked to testify concerning his knowledge of the ECONOMY RENT-A-CAR mark that Petitioner pleads in this proceeding as the basis for its claim of priority.

Certain documents and things may be introduced as exhibits during the testimony of Mr. Thunell including a trademark assignment and license agreements that mention BLT Consulting, LLC, and publicly available documents concerning BLT Consulting, LLC as a company.

3. Alejandro Muniz
President
Economy Rent-A-Car, Inc.
1080 Centro Colon
San Jose, Costa Rica
P.O. Box 1007
Tel.: 786-975-2222

Mr. Muniz is President and CEO of the named Petitioner in this proceeding. Mr. Muniz will be asked to testify concerning the transfers of rights in the pleaded ECONOMY RENT-A-CAR service mark. Mr. Muniz will also be asked to testify concerning his personal knowledge of BLT Consulting, LLC and Mr. Thunell. He will also be asked to testify concerning Petitioner's commercial correspondence, interaction, and relationship with Respondent.

Certain documents and things may be introduced as exhibits during the testimony of Mr. Muniz including agreements concerning the transfer of rights in Petitioner's mark and copies of correspondence from Petitioner addressed to Respondent.

4. Ioanna Myridaki
Account Manager, Google
Docs Building, Barrow Street
Dublin 4, Ireland
Tel.: +353 1 543 3083

Ms. Myridaki is Respondent's Google account manager, based in Dublin, Ireland. She will testify concerning Respondent's expenditures for advertising and promotion. Certain documents and things may be introduced as exhibits during the testimony of Ms. Myridaki including statistical summaries of annual advertising impressions in the United States, annual advertising expenditures targeted to US consumers, and US consumer recognition and perception of Respondent's brand.

5. Micael Wäxby
CEO, SoftIT AB
Kåsatorpsvägen 5
541 34 SKÖVDE
Tel.: +46 500 41 3000

Mr. Wäxby is CEO of SoftIT AB, a Swedish company that provides web development, software architecture, e-commerce platform, and database development services, among others, to businesses. He has been Respondent's partner in developing Respondent's proprietary software and database infrastructures. Mr. Wäxby will testify concerning Respondent's investments in these infrastructures. Certain documents and things may be introduced as exhibits during the testimony of Mr. Wäxby including account statements and technical documentation related to information technologies.

Respondent reserves the right to call witnesses for rebuttal and will so identify any such witnesses by the applicable deadline. Respondent further reserves the right to supplement these disclosures.

Respectfully submitted,



Peter S. Sloane
Cameron Reuber

Date: February 18, 2015
White Plains, New York

LEASON ELLIS LLP
One Barker Avenue, Fifth Floor
White Plains, New York 10601
Tel.: (914) 288-0022
Fax.: (914) 288-0023
E-mail: sloane@leasonellis.com
E-mail: reuber@leasonellis.com

Attorneys for Respondent

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing **RESPONDENT'S AMENDED PRETRIAL DISCLOSURES** was served upon counsel for Petitioner, this 18th day of February, 2015, by First-Class mail, postage prepaid, addressed as follows:

Samuel L. Littlepage, Esq.
Nicole M. Meyer, Esq.
Melissa Alcantara, Esq.
DICKINSON WRIGHT PLLC
1875 Eye St. N.W., Suite 1200
Washington, D.C. 20006-5420

A handwritten signature in black ink, appearing to read 'Deirdre A. Clarke', with a large, stylized initial 'D' and a long horizontal stroke extending to the right.

Deirdre A. Clarke